

1 **Thomas E. Clifford**
2 **Attorney at Law**
3 **2nd Floor, Alexander Building, San Jose**
4 **P.O. Box 506514**
5 **Saipan, MP 96950**
6 **Tel. (670)235-8846**
7 **Fax (670)235-8848**

8 **Attorney for Plaintiff**

9 **IN THE UNITED STATES DISTRICT COURT FOR THE**
10 **NORTHERN MARIANA ISLANDS**

11 **DONGBU INSURANCE**
12 **COMPANY, Ltd.,**

13 **Plaintiff,**

14 **v.**

15 **OKP (CNMI) CORPORATION**
16 **and JOAQUIN Q. ATALIG,**

17 **Defendants.**

Civil Action No. 08-0002

PLAINTIFF'S CASE
MANAGEMENT CONFERENCE
STATEMENT

Case Management Conference:

Date: May 2, 2008

Time: 10:00 a.m.

18 Plaintiff Dongbu Insurance Company, Ltd. ("Dongbu") states as follows pursuant to
19 Federal Rule of Civil Procedure 16 and LR 16.2CJ.e.2:

- 20 a. Service of process on parties not yet served. Service of process is complete.
- 21 b. Jurisdiction and venue. Not an issue.
- 22 c. Track assignment. Dongbu believes the Standard Track is appropriate.
- 23 d. Anticipated motions. Dongbu will file shortly its motion for summary judgment
24 to request a ruling from the court that it has no duty to defend or indemnify OKP
25 (CNMI) Corporation ("OKP") in the underlying lawsuit.
26

1 e. Anticipated or remaining discovery, including limitations on discovery.

2 Discovery has not yet been conducted. It is anticipated that dispositive motions
3 will be filed and heard first, and that if any issues remain, the parties will
4 conduct discovery and in such event, might need some limitations on discovery
5 pending resolution of the underlying lawsuit.

6 f. Further proceedings and scheduling of dates. It is anticipated the parties will
7 agree on scheduling dates at the case management conference.
8

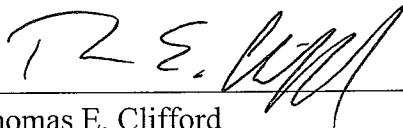
9 g. Appropriateness of special procedures. Not applicable.

10 h. Modification of standard pre-trial procedures. The parties agree that the
11 standard pre-trial procedures under the Local Rules are appropriate in this case.

12 i. Settlement prospects. Unknown at this time.

13 j. Any other matter conducive to the just, efficient resolution of the case. Not
14 applicable.
15

16 Respectfully submitted this 1st day of May, 2008.

17
18 

19 Thomas E. Clifford
20 Attorney for Plaintiff
21
22
23
24
25
26